REMARKS

Reconsideration and allowance of the present application are requested. Claims 1-24 remain pending in the application. By the foregoing amendment, claims 1, 9 and 19 are amended.

In numbered paragraph 3 of the Office Action, claims 1, 9 and 19, along with all dependent claims, are rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,424,971 B1 (Kreulen et al.) in view of U.S. Patent No. 6,542,635 B1 (Hu et al.). This rejection is respectfully traversed.

The Kreulen et al. patent and the Hu et al. patent, considered individually or in the combination relied upon by the Examiner, fail to teach or suggest Applicants' present invention as set forth in independent claims 1, 9 and 19. For example, the documents relied upon by the Examiner fail to teach or suggest modifying a separation distance between two particular text clusters in an electronic document to differentiate said electronic document. As such, claim 1 is allowable. Independent claims 9 and 19 are allowable for similar reasons.

Applicants have disclosed a document composition device comprising a processor and a memory communicating with the processor. As exemplified in Applicants' Figure 1, the memory 120 includes a document storage area 122 storing one or more electronic documents and a distance modifier routine 133. The processor 110 uses the distance modifier routine 133 to modify a separation distance between two particular text clusters in an electronic document (e.g., paragraphs [0018]-[0020]).

The disclosed document composition device modifies a document layout in order to differentiate the document (e.g., paragraph [0067]). The distance

modification is intended to create a layout differentiation that is small enough to be difficult to discern with the human eye, but being of sufficient differentiation for discrimination by a computerized system comparing documents (e.g., paragraph [0014]).

The foregoing features are broadly encompassed by the independent claims 1, 9 and 19, and are neither taught nor suggested by the Kreulen et al. patent and the Hu et al. patent, considered alone or in combination. The Kreulen et al. patent does not teach or suggest modifying a separation distance between two particular text clusters in an electronic document to differentiate said electronic document.

In paragraph 3, page 3 of the Office Action, the Examiner admits that the Kruelen et al. patent does not specifically teach "generating a distance adjustment"; but asserts that the Hu et al. patent teaches generating a distance adjustment. Notwithstanding the Examiner's assertion, the Hu et al. patent does not teach or suggest modifying a separation distance between two particular text clusters in an electronic document to differentiate said electronic document. The Hu et al. patent fails to overcome the deficiencies of the Kreulen et al. patent.

The Hu et al. patent is directed to a method for document comparison in which interval vectors are grouped into clusters. The Hu et al. patent discloses clustering derived metrics called interval vectors (abstract), but the Hu et al. patent does not cluster the underlying "particular text" as claimed. Accordingly, the Hu et al. patent does not teach or suggest modifying a separation distance between two particular text clusters as claimed.

Further, the He et al. patent does not modify a separation distance between two particular text clusters in an electronic document to differentiate an electronic

document. Rather, the Hu et al. patent teaches measuring the edit distance "so as to make the two sequences identical." This directly contradicts and teaches away from differentiating an electronic document as claimed. As such, even if there would have been motivation or suggestion to combine the Kreulen et al. patent and the Hu et al. patent in the manner suggested by the Examiner, the presently claimed invention would not have resulted.

The applied references, considered individually or in the combination relied upon by the Examiner, do not teach or suggest modifying a separation distance between two particular text clusters in an electronic document to differentiate an electronic document as claimed. Moreover, because the Hu et al. patent teaches measuring the edit distance "so as to make the two sequences identical," it is respectfully submitted that there would have been no motivation or suggestion to have combined the features of the Kreulen et al. patent and the Hu et al. patent to arrive at the presently claimed invention.

Thus, independent claims 1, 9 and 19 are allowable over the Kreulen et al. patent and the Hu et al. patent. The remaining claims depend from the aforementioned independent claims and recite additional advantageous features which further distinguish over the documents relied upon by the Examiner. As such, these claims are also considered allowable.

All objections and rejections raised in the Office Action having been addressed, it is respectfully submitted that the application is in condition for allowance and a Notice of Allowance is respectfully solicited.

Respectfully submitted,

BURNS, DOANE, SWECKER & MATHIS, L.L.P.

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By: _Reg. No. 48,360_

Patrick C. Keane
Registration No. 32,858

P.O. Box 1404
Alexandria, Virginia 22313-1404
(703) 836-6620